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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

WILLAMETTE RIVERKEEPER, et al.

Plaintiffs,

VS.

NATIONAL MARINE FISHERIES SERVICE, et al.,

Defendants,

OREGON DEP'T OF FISH AND WILDLIFE,

Defendant-Intervenor.

Case No.: 6:21-cv-34-AA

PARTIES' JOINT STIPULATION AND [PROPOSED] ORDER RE CASE SCHEDULE

In its case management order, the Court set July 9, 2021 as the deadline for Plaintiffs to file any motion to complete an administrative record. Doc. 19. Plaintiffs continue to review the

administrative record filed by Defendant National Marine Fisheries Service (NMFS) and underlying agency documents, but have not been able to finally determine whether the record is complete. Accordingly, the parties have conferred, and hereby respectfully and jointly stipulate to this schedule for any motion to complete NMFS's administrative record[1]:

On or before July 23, 2021, Plaintiffs shall file any motion to complete NMFS's administrative record. NMFS shall file a response to any motion within 14 days. Plaintiffs shall file a reply to a response to any motion within 7 days.

Date: July 9, 2021. Respectfully submitted,

/s/ Peter M. K. Frost Peter M. K. Frost (OSB #911843) Sangye Ince-Johannsen (OSB #193827) Elisabeth A. Holmes (OSB #120254) Attorneys for Plaintiffs

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¹ Defendant-Intervenor does not oppose an extension of time as to any motion to complete any of the administrative records that Defendants have filed in this case.

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Pursuant to the stipulation of the parties, IT IS SO ORDERED.

Date: July ____, 2021.

Ann Aiken
United States District Judge